

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF  
AMERICA

v.

EDMOND LAFRANCE,

Defendant.

CRIMINAL No. 16-CR-10090-IT

JOINT MOTION TO CONTINUE FINAL STATUS CONFERENCE AND FOR ENTRY OF  
ORDER OF EXCLUDABLE DELAY

The United States and defendant Edmond LaFrance hereby jointly move that the Final Status Conference in this case be postponed for three to four weeks. Discovery is complete and the parties believe that this period of time will provide an important opportunity for defense counsel to review these materials and confer with Mr. LaFrance, and for the parties to consider and confer on the matters set forth in LR 116.5(c).

Counsel for the government has a medical procedure scheduled for Wednesday, August 24, and requests that the final status conference be rescheduled for no earlier than August 31, should the Court determine not to grant the full period of continuance requested by the parties.

The parties further move that the Court enter an order of excludable delay for the period between August 24, 2016 and such date as the Court may continue the Final Status Conference in the interests of justice pursuant to 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

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United States Attorney

By: /s/ Stephen P. Heymann  
Stephen P. Heymann  
Assistant U.S. Attorney

/s/ Paul Kelly & John Commisso by sph  
Paul Kelly  
John Commisso  
Counsel for Defendant Edmond LaFrance

Date: August 19, 2016